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Attorneys for Individual and Representative Plaintiff Nathan Muchnick, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 (San Francisco Division)

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Case No. CV-07-5944-SC

This Document Relates to:

Case No. CV-07-5981-SC

NATHAN MUCHNICK, INC., on behalf of
 itself and all others similarly situated,

Plaintiff,

v.

CHUNGHWA PICTURE TUBES, LTD., *et al.*,

Defendants.

**DECLARATION OF BRENDAN
 GLACKIN IN SUPPORT OF
 PLAINTIFF'S *EX PARTE* MOTION
 FOR RELIEF FROM STAY AND FOR
ISSUANCE OF LETTERS ROGATORY**

1 I, Brendan Glackin, declare:

2 1. I am an attorney with the law firm Lief, Cabraser, Heimann & Bernstein,
3 LLP (“LCHB”), counsel for Plaintiff Nathan Muchnick, Inc. (“Plaintiff”) in this action. I am a
4 member of the bar of the U.S. District Court for the Northern District of California. I make this
5 declaration, except where noted, of my own personal knowledge and, if called upon to do so,
6 could and would testify competently to the facts hereto.

7 2. Plaintiff initiated this case on November 27, 2007. Attached hereto as
8 Exhibit A are true and correct copies of (1) the Complaint, (2) the Summons, (3) Magistrate
9 Judge Maria-Elena James’s Order Setting Initial Case Management Conference and ADR
10 Deadlines, and (4) the ECF Registration Information Handout.

11 3. On December 5, 2007, Plaintiff’s case was related to *Crago, Inc. v.*
12 *Chunghwa Picture Tubes, Ltd.*, Case No. CV-07-5944-SC. Attached hereto as Exhibit B is a true
13 and correct copy of the Related Case Order.

14 4. Attached hereto as Exhibit C are true and correct copies of: (1) Judge
15 Samuel Conti’s Order Setting Case Management Conference, (2) Judge Samuel Conti’s Order Re
16 Timely Filing of Pleadings, Briefs, Motions, Etc., and (3) and the Standing Order for All Judges
17 of the Northern District of California, Contents of Joint Case Management Conference.

18 5. Plaintiff has retained the services of Legal Language Services (“LLS”), a
19 company that specializes in foreign service of process, to effect service of process on six foreign
20 defendants in this action—Samsung Electronics Co. Ltd., Samsung SDI Co., Inc., and LG
21 Electronics Inc. in Korea; LP Displays International, Inc. in Hong Kong; Koninklijke Philips
22 Electronics N.V. in The Netherlands; and Chunghwa Picture Tubes, Ltd. in Taiwan.

23 6. Except for Chunghwa Picture Tubes, Ltd., LLS is causing the necessary
24 documentation to be served on each of these defendants pursuant to the Hague Convention on the
25 Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (“The
26 Hague Convention”), 20 U.S.T. 351, T.I.A.S. No. 6638, 658 U.N.T.S. 163.

27 7. LLS has explained that service of process through Letters Rogatory is the
28 only method recognized by both Taiwan and United States courts. The total cost of serving

1 Chunghwa Picture Tubes, Ltd. through the Letters Rogatory method is approximately \$4,270.
2 Service by Letters Rogatory requires the involvement of the Taiwanese government and/or court
3 system, and will take approximately four to seven months to complete. Attached as Exhibit D is a
4 true and correct copy of a December 14, 2007 letter from Legal Language Services regarding
5 service in Taiwan.

6 8. Pursuant to Civil Local Rule 4-2 and General Order 45, Plaintiff is
7 prepared to serve Chinese translations of the documents in Exhibits A, B, and C on Defendant
8 Chunghwa Picture Tubes, Ltd.

9 9. Pursuant to Civil Local Rule 7-11(a), Plaintiff was unable to obtain a
10 stipulation requesting judicial action because Chunghwa Picture Tubes, Ltd. has not been served
11 with the Complaint and Summons in this case.

12 I declare under penalty of perjury of the laws of the United States that the
13 foregoing is true and correct. Executed this 25th day of January, 2008, at San Francisco,
14 California.

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16 /s/ Brendan Glackin

17 Brendan Glackin
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